

EXECUTIVE SUMMARY

On August 02, 2005, Hickman Pipe and Tube Corporation submitted a permit renewal application to its existing title V permit (V-00-033) for a pipe manufacturing plant in Hickman, KY. There will be no change in their emissions or their production rate.

Hickman Pipe and Tube Corporation is classified as a major source due to their emissions of toluene from the spray coating operations. The metal paint coating (CP-2501) contains 70% VOC by weight and 65% toluene by weight. Each spray nozzle has a rated capacity of 0.01 gallons per minute, or 0.6 gallons per hour. With four nozzles, the total paint usage of the spray booth totals 2.4 gallons per hour. Based on 8760 hours per year, the potential to emit, the total paint usage is 21,024 gallons per year. The paint has a density of 7.5 pounds per gallon; therefore, the potential amount of paint used in the spray booth is 157,680 pounds per year, 78.84 tons per year. The VOC amount emitted from the spray booth is 55.11 tons per year, with toluene emitted at a rate of 51.24 tons per year. All VOCs are assumed to be emitted from the spray booth and not captured by the paint filters.

Also, the toluene emitted from the spray booth is assumed to be 100% released to the atmosphere. A Title V permit is required since the source emissions of toluene exceed the 10 ton per year limitation. Paint waste is disposed of by Safety-Kleen.

Public notice was placed in The Fulton Leader on November 22, 2006. The comment period ended on December 22, 2006. No comments were received during the 30-day comment period. The U.S. EPA has been notified of this proposed permit. On February 19, 2007, the Division was notified that Hickman Pipe & Tube has removed the 24-foot stack from the paint booth operation and sealed the opening. This eliminates the emissions of Particulate Matter into atmosphere and required a 502 (b)(10) change to their Title V permit to remove the emission limitations for PM. The Division notified the U.S. EPA of the latest development and since no comments were received during the 45-day comment period that ended on February 23, 2007, the changes were made to the proposed permit upon the approval of EPA and the proposed permit has become final.

In conclusion, a thorough analysis has been made of all relevant information available which pertains to this application. The Division has concluded that the proposed operation will comply with all air quality regulations and requirements.